

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	
<i>Defendant.</i>)	
_____)	

**MOTION TO SEAL GOVERNMENT’S RESPONSE TO DEFENDANT’S
MOTION FOR LEAVE TO FILE RULE 12.2(B) NOTICE**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal an un-redacted version of the government’s response to the defendant’s motion for leave to file rule 12.2(b) notice (Dkt. 312) and exhibit 1 attached to that response (Dkt. 312-1). The un-redacted copy will be delivered to the clerk’s office with a copy of this motion and provided to opposing counsel. A proposed Order is attached for the consideration of the Court.

The defendant’s motion raises, and the government’s filing responds to, concerns regarding the defendant’s mental health, including evaluations made by a psychologist. Sealing is necessary to safeguard the privacy of the defendant and his medical information. Counsel for the government has considered procedures other than sealing and none will suffice to protect this information from disclosure.

The Court has supervisory power over its own records and may, in its discretion, seal documents if the public’s right of access is outweighed by competing interests. *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th Cir. 1984). Such sealing is within the discretion of this Court and

CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/
William G. Clayman
Special Assistant United States Attorney (LT)
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, Virginia 22314
Phone: 703-299-3700
Fax: 703-299-3981
Email: william.g.clayman@usdoj.gov